## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

PORT OF HOUSTON AUTHORITY		
OF HARRIS COUNTY, TEXAS	§	CIVIL ACTION NO
Plaintiff	§	
	§	ADMIRALTY
	§	
V.	§	Pursuant to Rule 9(h) of the
	§	Federal Rules of Civil Procedure
	§	
M/V MSC VANESSA, AND HER	§	
TACKLE, EQUIPMENT, AND	§	
APPURTENANCES, in rem	§	
	§	
Defendant.	§	
	§	

## EMERGENCY EX PARTE MOTION FOR ISSUANCE OF A WARRANT FOR THE ARREST OF THE M/V MSC VANESSA

Plaintiff, Port of Houston Authority of Harris County, Texas ("Port Houston") by and through undersigned counsel, hereby moves this Court pursuant to Rule C of the Supplemental Rules for Admiralty or Maritime Claims or Asset Forfeiture Actions for the issuance of a warrant for the arrest of the defendant vessel, the M/V MSC VANESSA and her tackle, equipment, and appurtenances.

In further support of this motion, Port Houston refers to the Verified Complaint and the Verification, and submit a draft order.

WHEREFORE, the plaintiff respectfully request this Court grant their motion.

Dated: January 1, 2025.

DODE OF HOUGEON AUTHORITY

## Respectfully submitted,

/s/Kelly C. Hartmann

Kelly C. Hartmann

State Bar No. 24055631

Federal Bar No. 777411

khartmann@gallowaylawfirm.com

Trenton J. Wallis

State Bar No. 24113454

Federal Bar No. 3412033

twallis@gallowaylawfirm.com

Jacob C. Soto

State Bar No. 24126644

Federal Bar No. 3712679

jcsoto@gallowaylawfirm.com

John C. Lovell

State Bar No. 24134474

Federal Bar No. 3842781

jlovell@gallowaylawfirm.com

GALLOWAY, JOHNSON, TOMPKINS

Burr & Smith

1301 McKinney, Suite 1400

Houston, Texas 77010

(713) 599-0700 - telephone

(713) 599-0777 – facsimile

ATTORNEYS FOR PORT OF HOUSTON AUTHORITY OF HARRIS COUNTY, TEXAS